



February 23, 2015

Ms. Kristen Gomes  
California Regional Water Quality  
Control Board (RWQCB)  
Central Valley Region  
1685 "E" Street  
Fresno, CA 93706-2007

**RE: FAIRMEAD MUNICIPAL SOLID WASTE LANDFILL – COMMENTS ON THE TENTATIVE WASTE  
DISCHARGE REQUIREMENTS**

---

Dear Ms. Gomes:

On behalf of the County of Madera, Tetra Tech BAS (TTBAS) is submitting comments on the Tentative Waste Discharge Requirements (WDRs) for the Fairmead Municipal Solid Waste Landfill (FL). A general comment is that the WDRs do not reference the current permit documents (i.e., Joint Technical Document (JTD) and Preliminary Closure and Post-Closure Maintenance Plan (PCPCMP) previously submitted to the RWQCB which are dated January 2011 and February 2010. As an example, Attachment B to the Tentative WDRs does not show the same fill sequencing as that presented on Figure 4A of the JTD. If you need another copy of the latest permit documents, please let us know. Following are specific comments on the Tentative WDRs:

**FINDING 5:**

Finding No. 5 indicates that WMU 1 is inactive. However, waste is currently being placed on top of existing waste in WMU 1 and it is active. Also, in accordance with the latest JTD, the acreage for WMU 1 is 45.4 acres and the future total acreage in WMU 3 will be 27.1 acres. Cell 3A should be renamed 2C and is a future cell. Cells 3B and 3C should be renamed cells 3A and 3B. The limits of all future cells will be subject to the required projected airspace for the landfill and may result in adjustment of future cell limits within the approved WMU limits. It is recommended that this finding be revised to reflect this latest information from the JTD.

**FINDING 22 WASTE CLASSIFICATION AND UNIT CLASSIFICATION:**

Condensate is currently used as dust control on lined areas so we recommend this finding add "*or is used for dust control in lined areas.*"

**FINDING 65 CONSTRUCTION AND ENGINEERED ALTERNATIVE LINER SYSTEM:**

We request that for the LCRS system, it prescribe that it be placed above the upper HDPE liner layer and that it allow for an engineered alternative.

**FINDING 69 LANDFILL CLOSURE:**

The Discharger submitted a ~~2004~~ 2010 Preliminary Closure and Postclosure Maintenance Plan for closure and post-closure maintenance of the unlined and lined WMUs at the Facility.

## FINDING 70 LANDFILL POST-CLOSURE MAINTENANCE:

The Discharger submitted a ~~2004~~ 2010 *Preliminary Closure and Postclosure Maintenance Plan* for closure and post-closure maintenance of the unlined unit. The plan includes inspection, maintenance, and monitoring of the landfill during the post-closure maintenance period, and includes a post-closure maintenance cost estimate for the entire Facility.

## B. DISCHARGE SPECIFICATIONS 7:

The Discharger may dispose of other non-hazardous, non-designated waste as described in the *Waste Acceptance Plan*, including inert waste and construction debris; dead animals; treated biosolids; treated auto shredder waste; ash and cement kiln dust; and contaminated soils after approval of the *Waste Acceptance Plan* by CalRecycle.

It is suggested that the following sentence be added to the specification:

*“The Discharger may propose modifications to the Waste Acceptance Plan in the event regulations are revised, site conditions change, other waste types potentially applicable for disposal are identified, or other changes that may affect waste disposal are identified. Changes to the Waste Acceptance Plan will require Central Valley Board staff and CalRecycle approval.”*

## D. CONSTRUCTION SPECIFICATIONS

For Section 1(b)(1), we propose to fix the reference to “Construction Specification D.4” for the subgrade. The previous Construction Specification D.4 called out a reference to the following text that describes the prescribed subgrade.

*“The subgrade for the side slopes of each cell of expansion Unit 3 shall be prepared in an appropriate manner using accepted engineering and construction methods so as to provide a smooth surface that is free from rocks, sticks, or other debris that could damage or otherwise limit the performance of the of the 40-mil thick HDPE geomembrane.”*

We would suggest adding this previous specification text back to the end of Section 1(b)(1) and removing the carry over reference to “Construction Specification D.4” which no longer discusses subgrade preparation.

For Section 1(a)(1), we propose adding “*or an approved engineered alternative:*” at the end of ... that meets the following criteria. This is a narrow specification that could be revised and still meet groundwater protection standards set forth in Title 27.

Construction specification 1(a)(2), 1(a)(3), 1(b)(2), and 1(b)(3) lock the facility into using a Gundseal material. Although Gundseal has been the most cost-effective liner material in the past, there is no guarantee that it will remain so in the future. We suggest that the specifications include an additional finding that will allow flexibility. For example:

*“In lieu of Specifications 2) and 3), the Discharger’s engineered alternative bottom liner system may include, in ascending order:*

- a. *A 40-mil thick HDPE geomembrane;*
- b. *A GCL that exhibits appropriate strength characteristics (hydrated) to accommodate stresses associated with specific landfill design parameters, with particular attention to interface, long-term creep shear, and bearing capacity; and*
- c. *A 60-mil thick HDPE geomembrane.”*

#### **M&RP GROUNDWATER MONITORING NO. 1**

The M&RP identifies residential wells R-1, R-2, R-3, and R-4 as being part of the monitoring network. These wells are being monitored by the County as a courtesy to the property owners and they have not been identified as part of the monitoring network in the past. We recommend that they not be included as monitoring points in the new WDRs.

Thank you for the opportunity to provide comments on the Tentative WDRS for the FL. If you should have any questions regarding these comments please feel free to contact me at (909) 860-7777 or [christine.arbogast@tetrattech.com](mailto:christine.arbogast@tetrattech.com) or Mr. Ahmad Alkhayyat at [ahmad@madera-county.com](mailto:ahmad@madera-county.com).

Respectfully Submitted,



Christine M. Arbogast, P.E.

Vice President, Solid Waste Division